

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Alexandra Benedicto, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since June 2023. I am currently assigned to the FBI's San Juan Field Office, located in San Juan, Puerto Rico. My official duties include, but are not limited to, the investigation of domestic terrorism and related crimes as a member of the Joint Terrorism Task Force (JTTF). As a Special Agent, I am a federal law enforcement officer under applicable provisions of the United States Code and the Federal Rules of Criminal Procedure. I have received training and have experience in the enforcement of laws in the United States, including laws related to threatening communications, domestic terrorism, crimes against children, and violent crime violations. Previously, I was an FBI Intelligence Analyst from August 2016 through June 2023, during which time I worked on national security intelligence matters for various federal violations and programs to include, but not limited to, domestic and international terrorism, counterintelligence, and various criminal violations. As a result, I am familiar with procedures, activities, and investigative techniques associated with these investigations.

2. I make this affidavit based on the facts and circumstances surrounding this investigation, both from my own investigative activities and from information obtained from law enforcement officers and others with personal knowledge of the facts. This affidavit does not contain all the information derived from this investigation, only that which is sufficient to demonstrate probable cause to believe that a crime has been committed.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe Zoraida Rivera Martinez has violated Title 18 U.S.C. 876 (mailing threatening communications).

FACTS ESTABLISHING PROBABLE CAUSE

BACKGROUND

4. The United States is investigating Zoraida Rivera Martinez (RIVERA) for sending threatening communications to the Puerto Rico Housing Finance Authority, known in Spanish as *Autoridad para el Financiamiento de la Vivienda* (AFV), and the FBI. The AFV is a local government administration that provides subsidized mortgages to families in need and offers various government programs to assist with down payments of low-income home buyers.

5. On March 1, 2024, FBI San Juan received a complaint from an employee at AFV (VICTIM 1) regarding threats made via physical mail and electronic mail to AFV, VICTIM 1, and two other employees of the AFV (VICTIM 2 and VICTIM 3). RIVERA had contacted the AFV in the past to report alleged housing fraud committed by individuals at an identified residence in Toa Baja, Puerto Rico (TOA BAJA INDIVIDUALS).

6. On March 6, 2024, FBI Special Agents interviewed RIVERA at her residence, located a B-3 Calle 10, Monte Lindo, Dorado, Puerto Rico 00646 ("TARGET LOCATION"). During the interview, RIVERA provided her phone number as 939-277-2779. RIVERA confirmed she had issues with the AFV and the TOA BAJA INDIVIDUALS since 2018. RIVERA confirmed she had visited the AFV offices, but not for a long time. RIVERA denied ever sending any written letters to the AFV. FBI Special Agents emphasized that lying to a Federal Agent and making threats of violence to include shooting, bombing, or hiring anyone else to do so was a federal

violation. Subsequent consent to search the TARGET LOCATION for explosive chemicals and bomb making materials did not yield any positive results.

7. On March 13, 2024, VICTIM 1, VICTIM 2, and VICTIM 3 received an email from “oquendocarlos812@gmail.com” containing death threats and bomb threats to the AFV, and allegations of housing fraud committed by the TOA BAJA INDIVIDUALS. Since this email, the AFV has received two additional emails containing threats from the same sender. The AFV and the FBI have also received phone calls from phone number 939-277-2779 with similar complaints, some of which contained threats.

Physical Mail

8. Between February 2022 and April 2024, the AFV received a total of six letters detailing similar allegations of housing fraud, all pertaining to the TOA BAJA INDIVIDUALS. Of the six letters mailed, five contained threatening language toward AFV, VICTIM 1, and the FBI. The letter not containing threats was delivered to AFV in person on August 31, 2023, in which RIVERA asked to see VICTIM 1 and VICTIM 2, but was denied entry into the building. The letter included the same housing fraud allegation pertaining to the TOA BAJA INDIVIDUALS in which RIVERA signed her name as “Zoraida Rivera Martinez” and provided her phone number as 939-277-2779. The writer in the five letters containing threats self-identifies as various TOA BAJA INDIVIDUALS who RIVERA accepted in her March 6, 2024, interview to the FBI that she had issues with in the past.

9. In an interview with the FBI, VICTIM 1 believed RIVERA to be the true author of all six letters, based on a comparison to the letter RIVERA left in person containing similar handwriting and language, along with the same allegations RIVERA had made in the past about the TOA BAJA INDIVIDUALS.

10. On May 26, 2024, the FBI received a letter containing threats in which the writer self identifies as one of the TOA BAJA INDIVIDUALS. The letter contained similar language and threats included in the five threatening letters received by AFV.

11. The six letters containing threats sent to AFV and the FBI included but is not limited to the following language in Spanish:

- "Tengo un punto de drogas y le voy a poner una bomba en el edificio" which summary translates in English to "I have a drug point and I am going to place a bomb in the building"
- "FBI y Vivienda lo voy a matar y tirotealo" which summary translates in English to "FBI and Vivienda I am going to kill and shoot you"
- "FBI...los voy a matar y le voy a poner una bomba en la oficina de san juan" which summary translates in English to "FBI...I will kill you and I will place a bomb in the San Juan office"

Electronic Mail

12. As of March 2024, the AFV has received a total of 32 emails addressed both individually and varying combinations of AFV, VICTIM 1, VICTIM 2, VICTIM 3 and identified VICTIM 4, another AFV employee. The first 29 emails did not contain threats and detailed allegations of housing fraud, all pertaining to the TOA BAJA INDIVIDUALS. These 29 emails,

ranging in date from December 2022 through October 2023 were sent by “wwwzoraida0086@gmail.com”, self-identified as “Zoraida Rivera.” Of these 29 emails, two emails dated November 8, 2021, and June 20, 2023, provide RIVERA’s phone number as 939-277-2779. This is the same phone number from which the AFV and the FBI have also received phone calls, some of which contained threats.

13. Email address “wwwzoraida0086@gmail.com” is attributed to subscriber name “Zoraida Rivera” and recovery SMS phone number 939-277-2779.

14. Of the 32 emails, three emails contained threats and allegations of housing fraud pertaining to the TOA BAJA INDIVIDUALS, all sent on March 13, 2024, to VICTIM 1, VICTIM 2, and VICTIM 3. The author of the three emails self-identifies as “Carlos Oquendo,” email address “oquendocarlos812@gmail.com”. The three emails included but were not limited to the following language in Spanish:

- “los voy a matar no me importa si se lo dice a los federales cabrones le voy a poner una bomba en los edificios afvpr si me vota de la casa” which summary translates in English to “I’m going to kill them I don’t care if you tell the fucking feds I’m going to place a bomb in the afvpr buildings if you kick me out of the house”
- “como me vote te mato cabrones yo vivo en [Identified Address 1] o [Identified Address 2] wele bicho cabrones lo voy a matar y ponerle una bomba” which summary translates in English to “since I’m kicked out I will kill you assholes I live in [Identified Address 1] or [Identified Address 2] idiot assholes I’m going to kill and place a bomb”

- “lo voy a matar y tengo bomba y punto de drogas en alto de Cuba me gusta hacerle Dano alas gente” which summary translates in English to “I’m going to kill and I have a bomb and drug point in alto de Cuba I like to hurt people”

15. Email address “oquendocarlos812@gmail.com” is attributed to subscriber name Carlos Oquendo and is linked via cookies and Android profile to “rzoraida993@gmail.com”. Email address rzoraida993@gmail.com is attributed to subscriber name “Zoraida Rivera.”

Phone Calls

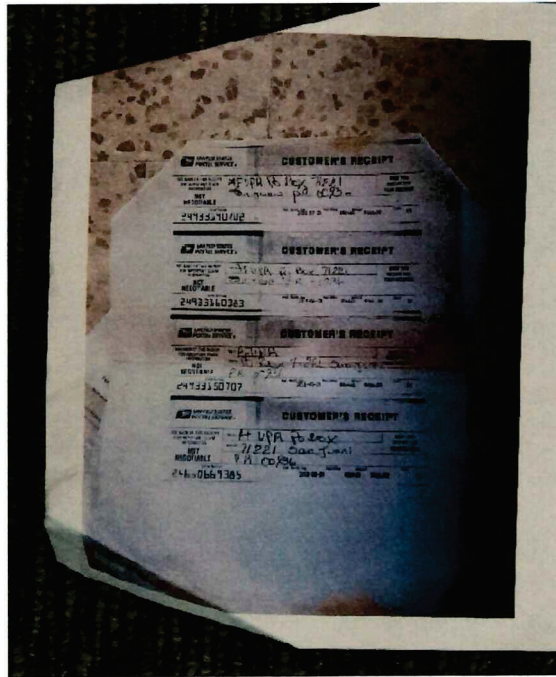
16. Beginning April 5, 2024, through June 10, 2024, phone number 939-277-2779 made 19 phone calls to the FBI. Of the 19 phone calls, in one phone call on April 6, 2024, the caller self-identified as Zoraida RIVERA and provided phone number 939-277-2779. In 16 phone calls, the caller identified herself as various names and phone numbers, all attributed to the TOA BAJA INDIVIDUALS. The caller alleged issues with the TOA BAJA INDIVIDUALS, to include allegations the TOA BAJA INDIVIDUALS are fugitives from Oklahoma and are receiving illegal housing benefits in Oklahoma while hiding in Puerto Rico. The remaining two phone calls made by phone number 939-277-2779 disconnected prior to the caller providing any details. None of the 19 phone calls contained threats.

SEARCH WARRANT OF RIVERA’S RESIDENCE AND PHONE

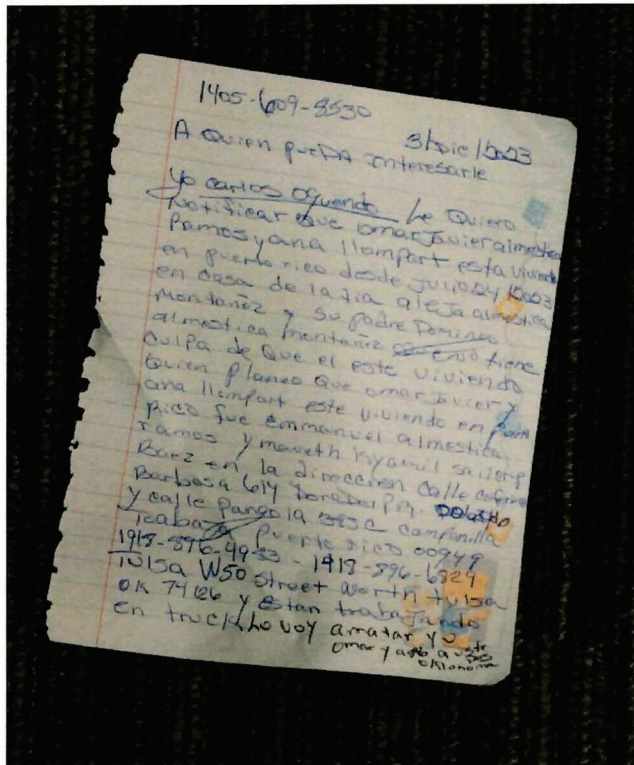
17. On July 17, 2024, FBI San Juan executed a search warrant for RIVERA’s cellular device and residence, (TARGET LOCATION in order to seize any evidence, fruits, and instrumentalities related to violations of Title 18 U.S.C. 876 (mailing threatening communications)).

18. On July 17, 2024, as a result of the service of a search warrant at TARGET LOCATION, the FBI located and seized multiple items. Based on my training and experience, these items are consistent in nature with the letters received by AFV and the FBI that contained threats. Evidence seized included but was not limited to the following:

- A printed picture of US Postal Service Receipt to AFVPR PO Box 71221, San Juan, PR 00936 on 7/30/2018 (serial number 24933190702), 6/28/2018 (serial number 24933160383), 5/29/2018 (24933150707), and 8/30/2018 (serial number 24660669385)



- An unfinished handwritten letter with the author self-identifying as one of the TOA BAJA INDIVIDUALS on apparent same stationary from past letters that contained threats as follows:



First page of letter on stationary seized from Target Residence dated 12/3/2023 from self identified TOA BAJA INDIVIDUAL and contains a threat

Numero de caso 20036657 21/1 febrero 2024
 Aviso por TOA Interesante:
 Yo Maveth Kyamil Salicrup Padz, en Manuel almeida Ramos Quiero que sepa que nosotros mandamos la casa de campanilla como ustedes se metan a mi casa calle panola 355c campanilla Toa Baja PR 00744 he voy a MATAR A Todos porque yo tengo un Bechiche en Orlando Florida con mi Marido que tengo un Apartamento y cogemos Ayuda TAMBIEN para vivir que cuando Ojalá tuvier a almeida Ramos y la esposa ana llampart para hacerle una denuncia A Zepora Rivera Martinez y Separar a A. Sogro Domingo Almeida Montañez para mentile decir que vivia con nosotros porque nosotros 4 planeamos romper el matrimonio para que el Sogro de suera con el hijo para

First page of letter on stationary dated 2/21/2024 from self-identified TOA BAJA INDIVIDUAL and received by VICTIM 1 and 2 at AFV. Contains multiple threats.

19. A review of digital evidence from RIVERA's cellular device yielded multiple emails sent to VICTIMS 1, 2, and 3 between November 2023 through June 2024. These emails did not contain threats.

INTERVIEW OF RIVERA

20. During the service of the search warrant at the TARGET LOCATION, RIVERA was informed of her rights and was interviewed by FBI San Juan personnel. During the interview, RIVERA confirmed she is the only user of her cell phone with aforementioned phone number 939-277-2779. RIVERA was shown various images of letters, some of which contained threats and some of which did not. RIVERA denied sending all of them except of the one that listed her name,

dated August 31, 2023, and did not contain threats. RIVERA also denied calling the FBI more than one time, despite her phone number listed in FBI recorded call logs 17 other times.

21. Since the interview and the search of RIVERA's cellular device and residence, VICTIM 1 and VICTIM 2 at the AFV received another letter containing multiple threats, dated August 28, 2024. The letter contained similar language and threats as the aforementioned threat letters to the FBI and AFV.


22. On May 28, 2025, FBI San Juan received a letter dated May 21, 2025, in which the author self-identified as one of the TOA BAJA INDIVIDUALS. The letter contained similar language and threats as the aforementioned threat letters to the FBI and AFV.

23. Between December 2024 through May 13, 2025, phone number 939-232-6954, also attributed to RIVERA, called the FBI 28 times. None of these calls contained threats. On April 7, 2025, RIVERA called AFV. The phone call did not include threats, and RIVERA hung up after AFV told her the AFV case was closed.

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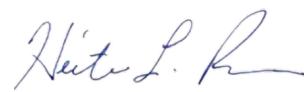
CONCLUSION

24. Based on the forgoing information, I respectfully submit there is probable cause that Zoraida Rivera Martinez violated Title 18 U.S.C. 876 (mailing threatening communications).



Alexandra Benedicto
Special Agent
Federal Bureau of Investigation

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 9:19 am on June 17, 2025, in San Juan, Puerto Rico.



Hon. Hector Ramos Vega
United States Magistrate Judge
United States District Court
District of Puerto Rico

